

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA

CRIM NO. 17-cr-20639

v.

HON. TERRENCE BERG

D-1 MICHAEL DEANGELO GRIFFIN,
D-2 DENNIS CLIFTON EPPS,
D-3 MARIANO LOZOYA GARCIA,
D-4 RUBEN VALDEZ, JR.,
D-5 TROY DONTEL HARRIS

Defendants.

Violations:

18 U.S.C. § 2261A(1)
18 U.S.C. § 2261(b)(1)
18 U.S.C. § 924(c) & (j)
18 U.S.C. § 1952
18 U.S.C. § 2
21 U.S.C. § 846
21 U.S.C. § 841(a)(1)
21 U.S.C. § 851
18 U.S.C. § 1956(a)(1)
18 U.S.C. § 1956(h)

THIRD SUPERSEDING INDICTMENT

The Grand Jury charges:

COUNT ONE

(18 U.S.C. §§ 2261A(1); 2261(b)(1) - *Interstate Travel with the Intent to Kill, Injure or Harass*; 18 U.S.C. § 2 - *Aiding and Abetting*)

D-1 MICHAEL DEANGELO GRIFFIN
D-2 DENNIS CLIFTON EPPS
D-3 MARIANO LOZOYA GARCIA

On or about December 18, 2016, in the Eastern District of Michigan and elsewhere, the defendants, MICHAEL DEANGELO GRIFFIN, DENNIS CLIFTON

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U.S. DISTRICT COURT
EASTERN MICHIGAN

EPPS and MARIANO LOZOYA GARCIA, aiding and abetting each other, did knowingly travel in interstate commerce from the area of Birmingham, Alabama to Detroit, Michigan, with the intent to kill, injure, or harass another person, that is Robert James Eddins IV, and in the course of, or as a result of, such travel the defendants placed Robert James Eddins IV and Ricardo Denard McFarlin in reasonable fear of death or serious bodily injury, and such acts resulted in the deaths of Robert James Eddins IV and Ricardo Denard McFarlin, all in violation of Title 18, United States Code, Sections 2261A(1), 2261(b)(1), and 2.

COUNT TWO

(18 U.S.C. §§ 924(c), 924 (j) - *Use and Carry of a Firearm During, and in Relation to, a Crime of Violence Causing Death;*
18 U.S.C. § 2 - *Aiding and Abetting*)

D-1 MICHAEL DEANGELO GRIFFIN
D-2 DENNIS CLIFTON EPPS
D-3 MARIANO LOZOYA GARCIA

On or about December 20, 2016, in the Eastern District of Michigan and elsewhere, the defendants, MICHAEL DEANGELO GRIFFIN, DENNIS CLIFTON EPPS and MARIANO LOZOYA GARCIA, aiding and abetting each other, did knowingly and intentionally use, carry, brandish, and discharge a firearm, during and in relation to a crime of violence for which the defendants may be prosecuted in

a court of the United States, that is, traveling in interstate commerce with the intent to kill, injure, or harass another person, as alleged in Count One of this indictment, and in so doing, the defendants committed murder as defined in Title 18, United States Code, Section 1111, that is the unlawful killing of Robert James Eddins IV, and Ricardo Denard McFarlin, with malice aforethought, all in violation of Title 18 United States Code, Sections 924 (c), 924 (j), and 2.

COUNT THREE

(18 U.S.C. §§ 1952- *Interstate Travel in Aid of Unlawful Activity*;
18 U.S.C. § 2 - *Aiding and Abetting*)

D-1 MICHAEL DEANGELO GRIFFIN
D-2 DENNIS CLIFTON EPPS
D-3 MARIANO LOZOYA GARCIA

On or about December 18, 2016, in the Eastern District of Michigan, and elsewhere, the defendants, MICHAEL DEANGELO GRIFFIN, DENNIS CLIFTON EPPS and MARIANO LOZOYA GARCIA, aiding and abetting each other, did knowingly travel in interstate commerce from the area of Birmingham, Alabama to Detroit, Michigan, with the intent to commit violence to further an unlawful activity, that is, conspiracy to distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 846, and thereafter

committed and attempted to commit the crime of violence, to further such activity, and the crime of violence resulted in the deaths of Robert James Eddins IV and Ricardo Denard McFarlin, all in violation of Title 18, United States Code, Sections 1952 and 2.

COUNT FOUR

†

(18 U.S.C. §§ 924(c), 924(j) - *Use and Carry of a Firearm During, and in Relation to, a Crime of Violence Causing Death;*
18 U.S.C. § 2 - *Aiding and Abetting*)

D-1 MICHAEL DEANGELO GRIFFIN
D-2 DENNIS CLIFTON EPPS
D-3 MARIANO LOZOYA GARCIA

On or about December 20, 2016, in the Eastern District of Michigan and elsewhere, the defendants MICHAEL DEANGELO GRIFFIN, DENNIS CLIFTON EPPS and MARIANO LOZOYA GARCIA, aiding and abetting each other, did knowingly and intentionally use, carry, brandish, and discharge a firearm, during and in relation to a crime of violence for which the defendants may be prosecuted in a court of the United States, that is, traveling in interstate commerce with the intent to commit a crime of violence to further an unlawful activity, as alleged in Count Three of this indictment, and in so doing, the defendants committed murder as defined in Title 18, United States Code, Section 1111, that is the unlawful killing of

Robert James Eddins IV and Ricardo Denard McFarlin, with malice aforethought, all in violation of Title 18 United States Code, Sections 924 (c), 924 (j), and 2.

COUNT FIVE

(21 U.S.C. §§ 846, 841(A)(1), 841(b)(1)(A) (ii) & 841(b)(1)(C) - *Conspiracy to Possess with Intent to Distribute and to Distribute Cocaine and Heroin*)

D-1 MICHAEL DEANGELO GRIFFIN
D-2 DENNIS CLIFTON EPPS
D-3 MARIANO LOZOYA GARCIA
D-4 RUBEN VALDEZ, JR.
D-5 TROY DONTEL HARRIS

From in or about June 2016, said date being approximate, and continuing to the date of this indictment, in the Eastern District of Michigan and elsewhere, the defendants, MICHAEL DEANGELO GRIFFIN, DENNIS CLIFTON EPPS and MARIANO LOZOYA GARCIA, RUBEN VALDEZ, JR., and TROY DONTEL HARRIS, did knowingly, intentionally and unlawfully combine, conspire, confederate and agree with one another and with other persons, both known and unknown to the Grand Jury, to possess with intent to distribute and to distribute 5 kilograms or more of a mixture containing a detectable amount of cocaine and a mixture or substance containing a detectable amount of heroin, all in violation of Title 21, United States Code, Sections 846, 841(a)(1), 841(b)(1)(A)(ii), and

841(b)(1)(C).

Prior Convictions – Sentencing Enhancement

Pursuant to Title 21, United States Code, Sections 841 and 851, the grand jury finds the following:

1. Before **MICHAEL DEANGELO GRIFFIN** committed the offense charged in this count, **MICHAEL DEANGELO GRIFFIN** had a final conviction for a serious drug felony, namely, a conviction under 21 United States Code, Section 841(a)(1), possession with the intent to distribute cocaine base, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.
2. Before **MARIANO LOZOYA GARCIA** committed the offense charged in this count, **MARIANO LOZOYA GARCIA** had a final conviction for a serious drug felony, namely, a conviction under 21 United States Code, Section 841(a)(1), possession with the intent to distribute 5 kilograms or more of cocaine, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.
3. Before **RUBEN VALDEZ, Jr.** committed the offense charged in this count,

RUBEN VALDEZ, Jr. had a final conviction for a serious drug felony, namely, a conviction under 21 United States Code, Sections 846 and 841(a)(1), conspiracy to possess with the intent to distribute 100 kilograms or more of marijuana, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

4. Before **TROY DONTEL HARRIS** committed the offense charged in this count, **TROY DONTEL HARRIS** had a final conviction for a serious drug felony, namely, a conviction under 21 United States Code, Sections 846 and 841(a)(1), conspiracy to possess with the intent to distribute 100 kilograms or more of marijuana, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

COUNT SIX

(18 U.S.C. §§ 924(c), 924 (j) - *Using and Carrying a Firearm During and in Relation to a Drug Trafficking Crime;*
18 U.S.C. § 2 - *Aiding and Abetting*)

D-1 MICHAEL DEANGELO GRIFFIN
D-2 DENNIS CLIFTON EPPS
D-3 MARIANO LOZOYA GARCIA

On or about December 20, 2016, in the Eastern District of Michigan and elsewhere, the defendants, MICHAEL DEANGELO GRIFFIN, DENNIS CLIFTON EPPS and MARIANO LOZOYA GARCIA, aiding and abetting each other, did knowingly and intentionally use, carry, brandish, and discharge a firearm, during and in relation to drug trafficking crime for which the defendants may be prosecuted in a court of the United States, that is, conspiracy to possess with intent to distribute and to distribute controlled substances, as alleged in Count Five of this indictment, and in so doing, the defendants committed murder as defined in Title 18, United States Code, Section 1111, that is the unlawful killing of Robert James Eddins IV and Ricardo Denard McFarlin, with malice aforethought, all in violation of Title 18 United States Code, Sections 924 (c), 924 (j), and 2.

COUNT SEVEN

(18 U.S.C. §§1956(a)(1)(A)(i),(a)(1)(B)(i) and 1956(h)-
Conspiracy to Launder Monetary Instruments)

- D-1 MICHAEL DEANGELO GRIFFIN
- D-2 DENNIS CLIFTON EPPS
- D-3 MARIANO LOZOYA GARCIA
- D-5 TROY DONTEL HARRIS

From in or about June 2016 and continuing through the date of this indictment, in the Eastern District of Michigan, Southern Division and elsewhere, the defendants MICHAEL DEANGELO GRIFFIN, DENNIS CLIFTON EPPS, MARIANO LOZOYA GARCIA, TROY DONTEL HARRIS, and others known and unknown to the Grand Jury, knowing that the property involved represented the proceeds of some form of unlawful activity, as defined in Title 18, United States Code, Section 1956(c)(1), that is, the distribution of controlled substances, a felony under Title 21, United States Code, Section 841(a)(1), did knowingly, intentionally and unlawfully combine, conspire and confederate and agree with each other, and with others to conduct and cause to be conducted financial transactions which involved the proceeds of said unlawful activity, with the intent to promote the carrying on of said unlawful activity and to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of

the specified unlawful activity, in violation of Title 18, United States Code,

Sections 1956(a)(1)(A)(i),(a)(1)(B)(i) and (h)

All in violation of Title 18, United States Code, Section 1956(h).

THIS IS A TRUE BILL.

s/ *Grand Jury Foreperson*

GRAND JURY FOREPERSON

MATTHEW SCHNEIDER

United States Attorney

s/ *Julie A. Beck*

JULIE A. BECK

Chief, DRUG TASK FORCE UNIT

s/ *Rajesh Prasad*

RAJESH PRASAD

Assistant United States Attorney

s/ *Dawn N. Ison*

DAWN N. ISON

Assistant United States Attorney

Dated: June 19, 2019

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number 17-cr-20639
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information		Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :		Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		AUSA's Initials: <i>RJG</i>

Case Title: USA v. Michael Griffin, et al.

County where offense occurred : Wayne

Check One: Felony Misdemeanor Petty

Indictment/ Information --- no prior complaint.

Indictment/ Information --- based upon prior complaint [Case number:]

Indictment/ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: 17-cr-20639

Judge: Terrence Berg

Corrects errors; no additional charges or defendants.

Involves, for plea purposes, different charges or adds counts.

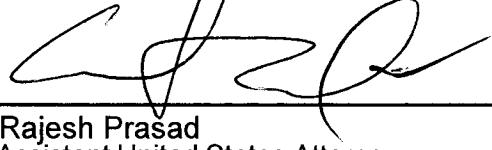
Embraces same subject matter but adds the additional defendants or charges below:

Defendant name	Charges	Prior Complaint (if applicable)
D-5 Troy Dontel Harris	21 USC 841(a)(1), (b)(1) (A)(ii), (b)(1)(C), and 846 18 USC 1956(a)(1)(A)(i), (a)(1)(B)(i) and 1956(h)	18-mj-30483

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

June 19, 2019

Date



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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.

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